



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND MID-ATLANTIC
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J&A No. ML-15-25
23 June 2015

JUSTIFICATION AND APPROVAL
FOR USE OF OTHER THAN FULL AND OPEN COMPETITION

SOLICITATION N40085-15-R-0001
P183 SOF INDOOR DYNAMIC RANGE
JOINT EXPEDITIONARY BASE LITTLE CREEK- FORT STORY,
VIRGINIA BEACH, VIRGINIA

1. Contracting Activity. Naval Facilities Engineering Command, Mid-Atlantic, Norfolk, Virginia
2. Description of the Action Being Approved. This procurement will result in a firm-fixed-price construction contract. The contract will be solicited utilizing full and open competition. The Contractor will be selected via best value source selection. This justification provides for the use of restrictive specifications to limit competition for a bullet trap, lead removal system, and hazardous dust collection system manufactured by Action Target. This proprietary product will be included in the construction contract specifications.
3. Description of Supplies/Services. Pursuant to the general requirements of the subject RFP, offerors will be required to provide a complete bullet trap, lead removal system, and hazardous dust collection system manufactured by Action Target in the P-183 SOF Indoor Dynamic Range at Joint Expeditionary Base Little Creek– Fort Story, Virginia Beach, Virginia. This training requirement, established by Naval Special Warfare (NSW), is based on the current and future requirements. The indoor range training program, which will utilize this facility, is a very rigorous dynamic training program with very exact training course of instructions.

The total estimated dollar value for this proprietary item related to this contract is \$ [REDACTED] which represents [REDACTED] % of the total cost of the estimated \$ [REDACTED] SOF Indoor Dynamic Range construction project.

4. Statutory Authority Permitting Other Than Full and Open Competition. 10 U.S.C. 2304(c)(1); FAR 6.302-1, Only one responsible source and no other supplies or services will satisfy agency requirements.
5. Rationale Justifying Use of Cited Statutory Authority. The NSW dynamic shooting training requirement is comprised of knowledge, technique, and live-fire training. This training prepares the warfighter for combat situations in real wartime situations. This is the final live-fire training the warfighter receives before going into Overseas Operations. NAVFAC and NSW dynamic shooting program office have researched other manufacturers and have observed field tested models used by other Department of Defense Agencies and commercial entities. Only the complete bullet trap, lead removal system, and hazardous dust collection system manufactured by Action Target provides the performance and sustainability required to meet the NSW training and sustainability requirements.

This system is comprised of three smaller systems connected together to make the complete bullet trap system. The three smaller systems are The Total Containment Trap, Screw Conveyor System, and a 2-Stage HEPA Dust Collection Unit.

The Total Containment Trap is the first component of the bullet containment system. It is constructed of ½" AR500 ballistic steel. The Total Containment Unit can withstand all types of ammunition that will be used in the range to include Tracer ammunition. The Total Containment Trap (TCT) Bridge is a load distribution and structural stiffening system that adds rigidity and lifetime to the trap upper mouth. The bridge spans the length between trap ribs and attaches to the upper mouth web at three locations along the width of the trap. The TCT-4 Bridge is a fully engineered, proprietary component manufactured only by Action Target, for Action Target bullet traps. See below diagram.

The Total Containment System is designed and constructed to withstand the high volume and intensity of the SOF Indoor Dynamic Range Program and is anticipated to be in operation throughout the life of the building. The second component is the Screw Conveyor System. This system directly connects to the Total Containment Trap. The Screw Conveyor System allows all lead contained in the bullet trap to be disposed of through an auger system without the exposure of personnel to hazardous lead debris and lead dust as well minimize downtime for lead cleanup from 3 weeks to just a few minutes. A three-week downtime in the training program results in sending the NSW platoons to other lesser capable ranges. This cost is approximately \$90,000 per class with multiple classes and TDY costs being incurred during the 3-week duration. Each shutdown will create an additional training cost to the NSW Command. The third component is the Dust Collection Unit. This unit is the final critical component of this three-part system. The Dust Collection Unit connects to the Total Containment System and collects hazardous lead dust and uses a 2-stage HEPA filtration system. The Dust Collection Unit creates a negative pressure in the chamber to reduce airborne lead dust in the chamber and around the chamber opening. All lead dust is collected and deposited in an exterior sealed drum system. This system eliminates the need for any personnel to be directly exposed to lead dust. A second benefit to the Dust Collection Unit is it aides in eliminating bullet debris from collecting in the shooting range. It allows all lead to be collected, cleaned, and disposed without any personnel exposure to hazardous lead dust. The construction of the package system durable to withstand the demands of over one million rounds of ammunition shot per year.

Potential consequences of using other than the Total Containment System package by Action Target will result in excess downtime due lead debris and dust cleanup. Additional consequences will be in more time consumed during the quarterly Industrial Hygiene inspections. Using a system from other manufacturers may result in NSW not being able to adequately and promptly ensuring system operation, thus not adequately preparing the war fighter for immediate deployment into overseas operations.

6. Description of Efforts Made to Solicit Offers from as Many Offerors as Practicable. Research indicates that other potential sources for these products do exist but are not capable of meeting all the NSW requirements and Industrial Hygiene requirements. There are multiple manufacturers that manufacture bullet trap and dust collection systems, but no manufacturer except Action Target that produces the auger style lead removal system. There are no manufacturers that construct the various components to be able to be assembled as a complete package system. Only the Action Target Total Containment System, Screw Auger System, and Dust Collection Unit can meet these requirements.

Technical conformance and sustainability are the primary factors under consideration. For technical conformance the two most important factors for the dynamic live-fire training include robust construction and hazardous lead collection and removal. For sustainability, durability, and the ability to meet current and future training requirements, it is very important to ensure training is met for the present and the future. Other manufacturers do not meet these factors ensuring mission success. Procurement of the Total Containment System, Screw Auger System and Dust Collection Unit from other than Action Target Incorporated poses risks to the NSW Indoor Dynamic live-fire training requirement, because the other manufacturers do not meet both the bullet capture performance requirements and provide engineering controls for hazardous lead cleanup requirements using an automated process in a complete package. These risks are not in the best interest of the Government.

7. Determination of Fair and Reasonable Cost. The Contracting Officer has determined the anticipated cost to the Government of the supplies/services covered by this J&A will be fair and reasonable, based on the competitive nature of the overarching procurement.

8. Actions to Remove Barriers to Future Competition. For future requirements of this type, NAVFAC Mid-Atlantic will conduct current market research to determine available sources. If other potential sources emerge, NAVFAC MIDLANT will assess whether competition for future requirements has merit and is feasible.

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